

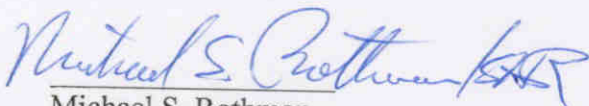
shifting or sharing of certain ESI discovery costs, including vendors' and attorneys' fees, under appropriate circumstances pursuant to Fed. R. Civ. P.

VIII. Stipulation and Order; Dispute Resolution.

The parties shall submit a stipulation and order to the Court, incorporating this agreement. Any disputes over discovery of ESI may be submitted to Court under the following expedited basis: the requester shall issue a letter via fax or email, to which the opposition shall respond within 5 calendar days, each letter no longer than 5 pages. The requester shall arrange a conference call with the Court to address the ESI discovery issues in the letters. The option to invoke this procedure shall not impair the use of a conventional motion to compel under the rules.


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